EXHIBIT A

CONCEPTS TO OPERATIONS, INC. REPORT

*"PROFESSIONALS PUTTING GOOD IDEAS TO WORK"*

# Analysis of the Relocation of Non-Nextel SMR, BILT and Public Safety Site Licenses in Channels 1-150 and 401-600 Under the FCC's Report and Order

Prepared for

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November 3, 2004

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**CONCEPTS TO OPERATIONS**

Mr. Charles M. Austin
President
Preferred Communication Systems, Inc.
6311 North O'Connor Blvd.
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Dear Mr. Austin:

Concepts To Operations, Inc. ("CTO") has completed an analysis of the Non-Nextel SMR and BILT Site licenses in Channels 1-150, 151-400 and 401-600 in the Private Land Mobile Radio Band (806-821 MHz/851-866 MHz) ("PLMRB"). The Federal Communications Commission's ("Commission" or "FCC") recently released Report and Order in the 800 MHz Public Safety Interference proceeding[1] moves Non-Nextel SMR and BILT Site-Specific Channels presently in the General Category Channels (Channels 1-150) to the Interleave Channels (Channels 151-400) to be vacated by Nextel Communications, Inc. ("Nextel"), Nextel Partners, Inc. ("Nextel Partners") and licensees who have executed a purchase option or management agreement with Nextel (collectively, "Nextel Control Group" or "NCG") on a geographic "footprint" basis.[2]

The *Report and Order*'s 800 MHz rebanding movement methodology is based upon separating Public Safety and other high-site and high-power systems into the lower end of the PLMRB denominated as the "Non-Cellular Block" (806-816.9875 MHz/851-861.9875 MHz) and low-site and low-power digital systems into the upper end of the PLMRB denominated as the "Cellular Block" (817-824 MHz/862-869 MHz).[3] The Commission determined to adopt this approach to minimize the intermodulation, out-of-band emissions ("OOBE") and other types interference experienced from low-site and low-power cellular systems with Public Safety and other high-site and high-power systems.[4] Although the *Report and Order* is not entirely clear on this point, based upon its rebanding movement methodology, SMR and BILT Site licenses in Channels 401-600 apparently also would be relocated to the Interleave Channels to be vacated by the Nextel Control Group on a geographic "footprint" basis.

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[1] *See Improving Public Safety Communications in the 800 MHz Band*, Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order and Order, WT Docket No. 02-55, FCC 04-16 ("*Report and Order*").
[2] *See id.*, at ¶¶ 21-23, 151-153; *see also* ¶¶ 154-156 (Expansion Band), ¶¶ 157-158 (Guard Band), ¶¶ 159-168 (Relocating ESMR Operations in 800 MHz Band) and ¶¶ 198 (Relocation Process Within NPSPAC Region).
[3] *See id.*, at ¶¶ 21-23 and 151-153.
[4] *See id.*, at ¶¶ 21-22.



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The *Report and Order* proposes to reserve the one hundred twenty (120) former NPSPAC Channels (822-824 MHz/866-868 MHz) exclusively to the Nextel Control Group.[5] The FCC thus seeks to move the Non-Nextel General Category and Lower 80 EA licensees' EA- and qualifying Site-Licensed Spectrum and Cellular-Architecture System licensees' Site-Licensed Spectrum to the Upper 200 Channels (Channels 401-600) presently held by the NCG, and available to be vacated.

The purpose of the report will be for submission to the Commission in support of the Comment to be filed by Preferred Communication Systems, Inc in response to the Commission's recent *Public Notice* soliciting comments with respect to Nextel's and others' requests for clarifications to the FCC's *Report and Order* released on August 6, 2004.[6] The report discusses the problems likely to be encountered in implementing the FCC's reorganization of the 800 MHz band into two separate Non-Cellular and Cellular Blocks. This constitutes the sole purpose of the report.

Based upon the FCC License Database as of June 30, 2004, and the assumptions set forth herein, the report concludes that in several major Economic Area ("EA") markets, the Nextel Control Group lacks sufficient MHz/Pops Equivalent and Total Spectrum to accommodate the SMR and BILT Channels in Channels 1-150 and 401-600 sought to be relocated by the Commission's *Report and Order* to the Interleave Channels (Channels 151-400) to be vacated by the NCG. In moving the Non-Nextel Site Channels within Channels 1-150 and 401-600 to the Interleave Channels on a geographic "footprint" basis, it is unclear whether the Commission and/or Nextel determined whether the Nextel Control Group's Lower 80 and BILT Site Channels possessed sufficient Total Channels and identical geographical "footprints" and population coverages to accommodate such relocation.[7]

The report also concludes that in several major EA markets the Nextel Control Group lacks the MHz/Pops Equivalent or even Total Spectrum within the Upper 200 Channels to accommodate the movement of Non-Nextel EA and Cellular-Architecture System licensees' spectrum to the new Cellular Block or ESMR portion of the band. Moreover, the report concludes that if Non-

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[5] *See id*., at ¶ 198.

[6] *Commission Seeks Comment on Ex Parte Presentations and Extends Certain Deadlines Regarding the 800 MHz Public Safety Interference Proceeding,* Public Notice, WT 02-55 (October 22, 2004)("*Public Notice*").

[7] In determining whether a SMR, BILT or public safety Site licensee is relocated to a comparable facility, the FCC determined that such facility must provide the same level as service as the incumbent's existing facilities, with transition to the new facilities as transparent as possible to the end user. Specifically, the Commission determined that such new facilities must have (1) equivalent channel capacity; (2) equivalent signaling capability, baud rate and access time; (3) coextensive geographic coverage; and (4) operating costs. *See id.*, at ¶ 201 & n. 527. The Commission further found that its rules defined "channel capacity" as the same number of channels with the same bandwidth that is currently available to the end user. *See* Amendment of Part 90 of the Commission's Rules To Facilitate Future Development of SMR Systems in the 800 MHz Frequency Band, PR Docket No. 93-144, *Second Report and Order*, 12 FCC Rcd 19079, 19112-13 ¶ 92 (1997)("*SMR Second Report and Order*").

Nextel SMR and BILT Site licenses in the Upper 200 Channels (Channels 401-600) are not relocated, in many EA markets the NCG lacks sufficient MHz/Pops Equivalent or Clean Spectrum to accommodate the movement of Non-Nextel EA and Cellular-Architecture System licensees’ spectrum to the new Cellular Block without requiring Nextel or Nextel Partners to vacate most of their Upper 200 Channels’ spectrum and thereby to lose considerable system capacity.

Finally, the report sets forth recommendations with respect to alternative relocation approaches that address the *Report and Order’s* practical and mathematical infirmities.

We set forth a summary of the report’s analysis and conclusions in the immediately following Executive Summary.

Sincerely,

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## Executive Summary

**Introduction.**

On August 6, 2004, the Federal Communications Commission ("Commission" or "FCC") released its *Report and Order* in the 800 MHz Public Safety Interference proceeding. Largely adopting the Enhanced Consensus Parties' Proposal,[8] the Commission bifurcated the Private Land Mobile Radio Band (806-824 MHz/851-869 MHz) ("PLMRB") into two separate blocks: a (1) Non-Cellular Block (806-816.9875 MHz/851-865.9875 MHz) reserved exclusively for high-site and high-power Public Safety, BILT and SMR systems; and (2) Cellular or ESMR Block (817-824 MHz/862-869 MHz) reserved exclusively for low-site and low-power digital cellular systems.[9] According to the FCC, such rebanding approach was based upon the Commission's premise it could "minimize that unacceptable interference in the 800 MHz band by placing similar system architectures in like spectrum and isolating dissimilar architectures from one another."[10]

Pursuant to such approach, the *Report and Order* would relocate the Non-Nextel Control Group SMR, BILT and Public Safety Site Licenses in the General Category Channels (Channels 1-150) to the Interleave Channels (Channels 151-400) held and to be vacated by Nextel Communications, Inc. ("Nextel"), Nextel Partners, Inc. ("Nextel Partners") and licensees who have executed a purchase option or management agreement with Nextel (collectively, "Nextel Control Group" or "NCG") on a geographic "footprint" basis.[11] Although not entirely clear, based upon the FCC's enunciated rationale for its determination to reorganize the 800 MHz band, it appears that the Report and Order would relocate Non-Nextel SMR, BILT and Public Safety licenses in the Upper 200 Channels (Channels 401-600 or 816-821 MHz/861-865 MHz) to the Interleave Channels held and to be vacated by the NCG.[12]

Moreover, the *Report and Order* would reserve the former NPSPAC Channels (822-824.9875 MHz/866-869.9875 MHz) exclusively to the Nextel Control Group's General Category EA- and Site-Licensed Spectrum.[13] The excess General Category and Interleaved Channels' EA- and Site-Licensed Spectrum to be vacated by the NCG would be replaced by an exclusive allocation of 1.9 GHz band spectrum.[14] As a result, the *Report and Order* would relocate the Non-Nextel

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[8] *See* Nextel Communications, Inc., Ex Parte Presentation, June 4, 2004; Nextel Communications, Inc., Ex Parte Presentation, June 7, 2004; Nextel Communications, Inc., Ex Parte Presentation, June 9, 2004; Nextel Communications, Inc., Ex Parte Presentation, June 14, 2004.

[9] *See Report and Order*, at ¶¶ 21-23 and 151-158.

[10] *See id.*, at ¶ 22.

[11] *See id.*, at ¶¶ 23 and 151.

[12] *See id.*, at ¶¶ 21-23, 151-158 and 159-168.

[13] *See id.*, at ¶¶ 198 and 306.

[14] *See id.*, at ¶¶ 65-73. The Commission maintained that it had the legal authority to allocate 10 MHz in the 1.9 GHz band exclusively to Nextel and Nextel Partners largely based upon its Section 316 authority to modify already-existing licenses by relocating them to new spectrum. *See id.*, at ¶ 67. It reemphasized this point by finding that such allocation of 1.9 GHz band spectrum did not involve the issuance of initial licenses and provided "Nextel access to substitute spectrum with which it may continue the development of its services." *See id.*, at ¶¶ 69 and 73.

EA licensee's General Category and Lower 80 EA- and qualifying Site-Licensed Spectrum and other Site-Licensed Spectrum and Cellular-Architecture System licensees' qualifying Site-Licensed Spectrum into the new Cellular Block or ESMR portion of the PLMRB by moving them to the Upper 200 Channels (Channels 401-600 or 816-824 MHz/861-869 MHz) presently largely occupied by the NCG.[15]

**Methodology.**

In developing the Non-Nextel Site SMR, BILT and Public Safety Licenses' Spreadsheet attached hereto as **Schedule 1,** CTO downloaded the FCC PLMRB license database as of June 30, 2004. We included a particular license as within an EA market if its site coordinates were located within the EA market's boundaries and the license was comprised of nonduplicated frequencies within such EA market.

Based upon the *Report and Order*, we assumed that Non-Nextel Site licenses within Channels 1-150 and 401-600 would be relocated on a geographic "footprint" basis to Interleave Channels (Channels 151-400) presently held by the Nextel Control Group. Based upon the Nextel Control Group License Holdings Spreadsheet attached hereto as **Exhibit B**, we determined that the NCG holds an average of fifty-two (52) Clean Channels or 2.6 MHz in the Lower 80 Channels. The NCG holds an average of thirty-three (33) BILT Site Channels. The Nextel Control Group holds no Clean BILT Channels in any EA market.

We then determined both the average (1) actual coverage area and (2) protected service area as measured by a 22 dBu contour of the SMR, BILT and Public Safety Site Channels within Channels 1-150 and 401-600 in the top eleven (11) EA markets used by the Commission to determine Nextel's average 800 MHz spectrum holdings throughout the U.S.[16] Overlaying such average coverage areas over the 2000 U.S. Census Tract, we then determined the average population covered by these licenses. Since the *Report and Order* relocates these Non-Nextel Site Channels into the Interleave Channels presently held and to be vacated by the Nextel Control Group, we then determined the average (1) actual coverage area and (2) protected service area as measured by a 22 dBu contour of the NCG's Lower 80 EA and Site and BILT Site Channels in the eleven (11) EA markets. Overlaying such average coverage areas over the 2000 U.S. Census Tract, we then determined the average population covered by these licenses. Where the NCG's Lower 80 EA authorizations were encumbered by a previously granted Site license held by a Non-Nextel licensee, we subtracted such Site license's area and population coverage from that of the Nextel Control Group's Lower 80 EA Authorization to determine its correct coverage figures.

**Conclusions.**

[15] *See id.*, at ¶¶ 159-168.

[16] *See id.*, at ¶ 318 & n. 733. For purposes of evaluating Nextel's spectrum holdings within the Interleave Channels to be vacated, the Commission analyzed Nextel's spectrum holdings within these Channels in the top fifteen (15) EA markets by population and then extrapolated Nextel's average number of Total Channels and spectrum in these EA markets for the entire U.S. and its territories. In conducting its analysis, the FCC deleted three border area EA markets—Detroit, Seattle and San Diego and the Atlanta EA market.

**Relocation of SMR, BILT and Public Safety Site Licenses Within Channels 1-150.**

SMR licensees hold an average of twenty-four (24) Site Channels within Channels 1-150. However, in forty-nine (49) EA markets in which 174,792,406 persons reside, such licensees hold an average of fifty-three (53) Site Channels, or 2.65 MHz. BILT licensees hold an average of fourteen (14) Site Channels, or .7 MHz, within Channels 1-150. However, in the forty-nine (49) more "heavily congested" EA markets, such licensees hold an average of thirty-three (33) Site Channels, or 2.65 MHz. Public Safety licensees hold an average of thirteen (13) Site Channels, or .65 MHz, within Channels 1-150. However, in the forty-nine (49) more "heavily congested" EA markets, such licensees hold an average of twenty-nine (29) Site Channels, or 1.45 MHz.

The Nextel Control Group holds an average of seventy-nine (79) total Lower 80 Channels, or 3.95 MHz, and fifty-two (52) Clean Lower 80 Channels, or 2.6 MHz. The NCG holds an average of thirty-three (33) total BILT Channels, or 1.65 MHz. The NCG holds no Clean BILT Channels in any EA market.

On average, SMR, BILT and Public Safety licensees' fifty-one (51) Site Channels within Channels 1-150 apparently can be relocated to the Lower 80 EA authorizations and Site Channels and the BILT Site Channels comprising an average of one hundred twelve (112) Channels, or 5.6 MHz, presently held and to be vacated by the NCG. However, the FCC requires that relocated licensees receive "comparable facilities" and defines such term as encompassing Channels with coextensive geographical and population coverage.[17] Since the NCG's Site Channels within the Interleave Channels (Channels 151-400) to be vacated often have smaller geographical coverage areas or "footprints" than those of the SMR, BILT and Public Safety licensees' spectrum holdings within Channels 1-150 to be relocated, in certain of these one hundred twenty-eight (128) EA markets, the *Report and Order*'s relocation approach fails to provide these Site licensees "equivalent channel capacity" and thus "comparable facilities" as required by Commission precedent and the *Report and Order* itself.[18]

However, problems clearly arise in the forty-nine (49) more "heavily congested" EA markets. In these EA markets, the SMR, BILT and Public Safety licensees hold an average of one hundred fifteen (115) Channels, or 5.75 MHz. As noted above, the Nextel Control Group holds an average of one hundred twelve (112) Channels, or 5.6 MHz. As a result, in these more "heavily congested" EA markets, even before considering the problem of the "mismatching" geographical "footprints," the NCG lacks the Lower 80 EA and Site Channels and BILT Site Channels to accommodate the *Report and Order*'s relocation of SMR, BILT and Public Safety licensees' Site Channels within Channels 1-150.

[17] *See SMR Second Report and Order*, at 19112-13 ¶ 92.
[18] *See Report and Order*, at ¶ 201 & n. 537.

**Relocation of SMR, BILT and Public Safety Site Channels Within Channels 401-600.**

SMR licensees hold an average of twenty-nine (29) Site Channels within Channels 401-600. However, in forty-nine (49) EA markets in which 174,792,406 persons reside, such licensees hold an average of forty-nine (49) Site Channels. BILT licensees hold an average of two (2) Site Channels within Channels 401-600. However, in the forty-nine (49) more "heavily congested" EA markets, such licensees hold an average of four (4) Site Channels. Public safety licensees hold an average of less than one (1) Site Channel within Channels 401-600. In the forty-nine (49) more "heavily congested" EA markets, such licensees hold an average of less than one (1) Site Channel.

The relocation of SMR, BILT and Public Safety licensees' Site Channels within Channels 401-600 does not change the conclusion set forth above with respect to whether the Nextel Control Group on average holds sufficient Lower 80 EA- and Site-Licensed Spectrum and BILT Site Channels to accommodate the *Report and Order*'s relocation of SMR, BILT and Public Safety licensees' Site Channels. However, with respect to the forty-nine (49) more "heavily congested" EA markets, such relocation of the SMR, BILT and Public Safety licensees' Site Channels within Channels 401-600 exacerbates the already overcrowded spectrum. With such relocation, an average of fifty-four (54) additional Site Channels would be moved into the Lower 80 EA and Site Channels and BILT Site Channels presently held and to be vacated by the NCG. Together with the relocation of SMR, BILT and Public Safety Site Channels within Channels 1-150, such relocation would result in an average excess of fifty-seven (57) Channels or 2.85 MHz of spectrum over the EA- and Site-Licensed Spectrum held by the Nextel Control Group and to be vacated in the Interleave Channels.

We also examined a "best case" scenario which assumes all of the geographic "footprints" of the Nextel Control Group's BILT Site Channels match those of the Non-Nextel SMR, BILT and Public Safety licenses within Channels 1-150 and 401-600 to be relocated under the *Report and Order*. As the Non-Nextel Site Licenses spreadsheet attached hereto as **Schedule 1** indicates, in thirty-eight (38) EA markets in which 103.18 million persons, or approximately thirty-six percent (36%) of the total U.S. population resides the NCG lacks sufficient spectrum holdings to accommodate the *Report and Order*'s relocation of the Non-Nextel Site licensees.

**Relocation of Non-Nextel EA and Cellular-Architecture System Licensees' Channels.**

The *Report and Order* seeks to minimize the intermodulation interference experienced by Public Safety and other high-site and high-power systems from the operations of low-site and low-power digital cellular systems by separating them into two separate blocks: (1) Non-Cellular (Channels 1-440 or 806-816.9875 MHz/851-861.9875 MHz); and (2) Cellular (Channels 441-720 or 817-824 MHz/862-869 MHz).[19] *The Report and Order* reserved the former NPSPAC Channels (Channels 601-720 or 822-824.9875/MHz866-868.9875 MHz) to the Nextel Control Group.[20] As a result, the *Report and Order* relocated the Non-Nextel EA licensees' EA- and qualifying Site-Licensed Spectrum and Cellular-Architecture System licensees' Site Channels to the Upper 200 Channels Spectrum (Channels 401-600) presently held by the NCG.

[19] *See id.*, at ¶¶ 21-23 and 151-153.
[20] *See* n. 12 *infra*.

For purposes of this analyzing whether the NCG holds sufficient spectrum within the Upper 200 Channels to accommodate the relocation set forth in the *Report and Order*, we assumed that the Non-Nextel SMR, BILT and Public Safety Site licenses within Channels 401-600 would not be relocated to the Interleave Channels (Channels 151-400) held by the NCG and to be vacated.

As the Nextel Control Group Upper 200 Channels Spreadsheet attached hereto as **Schedule 3** indicates, Nextel or Nextel Partners holds an average of one hundred sixty-eight (168) Clean Upper 200 Channels throughout the U.S. However, in forty (40) "heavily congested" EA markets in which 64,288,606 persons reside, Nextel holds an average of only one hundred fifty-five (155) such Clean Channels.[21] As noted above, the *Report and Order* relocates the Non-Nextel EA licensees' EA authorizations and qualifying Site Channels and the Cellular-Architecture System licensee' qualifying Site Channels to the Upper 200 Channels held by the Nextel Control Group on an EA market wide Clean and 1:1 basis. In the one hundred thirty-five (135) "less congested" EA markets, Nextel or Nextel Partners has sufficient spectrum within the Upper 200 Channels to accommodate the *Report and Order*'s relocation of Non-Nextel EA and qualifying Site-Licensed Spectrum.

However, in the forty (40) "heavily congested" EA markets, in which 64,288,606 persons reside, Nextel or Nextel Partners lacks sufficient spectrum to accommodate the *Report and Order*'s relocation without requiring them to vacate 120-200 channels within the Upper 200 Channels and thereby lose considerable sufficient system capacity in these EA markets.[22]

[21] For purposes of determining "heavily congested" EA markets in this context, we focused upon EA markets in which following the relocation of Non-Nextel EA- and qualifying Site-Licensed Spectrum, Nextel or Nextel Partners would hold fewer than eighty (80) channels within the Upper 200 Channels.

[22] Nextel already has voiced strong opposition to vacating a considerable portion of its Upper 200 Channels spectrum to accommodate the relocation of Non-Nextel EA and Cellular-Architecture System licensees respective EA- and qualifying Site-Licensed Spectrum. *See* Nextel Communications, Inc., Ex Parte Presentation, June 14, 2004, at p. 5 ("Obviously, being forced to cease operations, or deploy hundreds of millions of dollars worth of added infrastructure in these markets alone was not part of the balancing of interests sought by the Consensus Parties in proposing a comprehensive realignment of the 800 MHz band. It would be impossible for Nextel to support 800 MHz realignment under such circumstances.")

**Consensus Parties' Rebanding Proposal**
**Relocation Cost Analysis Report**

## I. Introduction.

On August 6, 2004, the Commission released its *Report and Order* in the 800 MHz Public Safety Interference proceeding. Largely adopting the Enhanced Consensus Parties' Proposal as a model for reorganization of the 800 MHz Private Land Mobile Radio Band (806-824 MHz/851-869 MHz),[23] the FCC divided the PLMRB into two separate and distinct blocks: (1) Non-Cellular Block (Channels 1-440 using 25 kHz bandwidth channels[24] or 806.0125-816.9875 MHz/851.0125-868.9875 MHz) and (2) Cellular Block; and (2) Cellular Block (Channels 441-720 using 25 kHz bandwidth channels[25] or 817.0125-823.9875 MHz/862.0125-868.9875 MHz).

Under the FCC's present PLMRB licensing scheme, 26.5 MHz was Cellular Eligible Service Spectrum. Such Spectrum was comprised of the following:

1. General Category Channels (Channels 1-150 or 7.5 MHz);
2. Lower 80 Channels (Channels 201-208, 221-228, 241-248, 261-268, 281-288, 301-308, 321-328, 341-348, 361-368 and 381-388 or 4 MHz);
3. Business and Industrial Land Transportation Channels (Channels 151-158, 161-168, 171-178, 181-188, 191-198, 212-217, 232-237, 252-257, 272-277, 292-297, 312-317, 332-337, 352-357, 372-377 and 392-397 or 5 MHz); and
4. Upper 200 Channels (Channels 401-600 or 10 MHz).

Under this licensing scheme, Public Safety was allocated one hundred ninety (190) Channels, or 9.5 MHz of spectrum.

The *Report and Order* increases the allocation of PLMRB spectrum to Public Safety by thirty (30) Channels, or 1.5 MHz.[26] Moreover, it reserves all "White Space" created by the Nextel Control Group's vacating the Interleave Channels (Channels 151-400 or 809.7625-815.9875 MHz/854.7625-860.9875 MHz).[27] The FCC and Nextel estimate that on average that such vacated spectrum comprises fifty (50) Channels or 2.5 MHz. Finally, it carves out 2 MHz from the upper end of the Interleave Channels (Channels 361-400 or 815.0125-815.9875 MHz/860.0125-860.9875 MHz and Channels 401-440 or 816.0125-816.9875 MHz/861.0125-861.9875 MHz) for use by Public Safety and other Non-ESMR operators, EA and Non-Cellular-Architecture System licensees. Public Safety licensees therefore receive an average increase of up to one hundred twenty (120) Channels or 6 MHz.

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[23] *See* n. 8 *infra*.

[24] Using the largely 12.5 kHz bandwidth channels for the NPSPAC Channels moving to the former General Category Channels, the Non-Cellular Block comprises Channels 1-150.

[25] Using the largely 12.5 kHz bandwidth channels for the NPSPAC Channels moving to the former General Category Channels, the Cellular Block comprises Channels 551-830.

[26] This increase occurs due to the Commission's allocating Channels 121-150 to Public Safety. Interestingly, Nextel has expressed opposition to the FCC's reservation of these thirty (30) Channels to Public Safety. *See, e.g.,* Nextel Communications, Inc., Ex Parte Presentation, September 21, 2004, at Third Power Point Slide and Nextel Communications, Inc., Ex Parte Presentation, September 16, 2004, at p. 2.

[27] *See Report and Order*, at ¶ 23 & nn. 55-56.

The *Report and Order* squeezes the 26.5 MHz of Cellular Service Eligible Spectrum into the new Cellular Block comprising only 14 MHz, a decrease of 12.5 MHz. Moreover, it exclusively reserves the former NPSPAC Channels to the NCG.[28] Further, it allocates 10 MHz of 1.9 GHz band spectrum exclusively to Nextel and Nextel Partners.[29] As a result, the *Report and Order* relocates the Non-Nextel EA and Cellular-Architecture System licensees' EA- and qualifying Site-Licensed Spectrum to the remaining 8 MHz (817-821 MHz/862-865 MHz) of the Upper 200 Channels within the new Cellular Block on an EA market wide Clean 1:1 basis.[30]

**II. Methodology.**

To determine the practical and mathematical viability of the *Report and Order*'s relocation of SMR, BILT and Public Safety Site licensees' spectrum within (1) Channels 1-150 and (2) the Upper 200 Channels (Channels 401-600) we initially downloaded a nationwide PLMRB database (as of June 30, 2004) from the FCC. To avoid "multiple counting" issues in determining which SMR, BILT and Public Safety Site licenses within Channels 1-150 and 401-600 were within a particular EA market, we included only Site licenses whose site coordinates were located within a particular EA market's boundaries and nonduplicated frequencies within such EA market.

Based upon the *Report and Order*, we assumed that Non-Nextel Site licenses within Channels 1-150 and 401-600 would be relocated on a geographic "footprint" basis to Interleave Channels (Channels 151-400) presently held by the Nextel Control Group. Based upon the Nextel Control Group License Holdings Spreadsheet attached hereto as **Exhibit B**, we determined that the NCG holds an average of fifty-two (52) Clean Channels or 2.6 MHz in the Lower 80 Channels. The NCG holds an average of thirty-three (33) BILT Site Channels. The Nextel Control Group holds no Clean BILT Channels in any EA market.

To determine whether the NCG holds sufficient spectrum to accommodate the *Report and Order*'s relocation of SMR, BILT and Public Safety licensees' spectrum holdings within Channels 1-150 and then within Channels 410-600, we then determined both the average (1) actual coverage area and (2) protected service area as measured by a 22 dBu contour of the SMR, BILT and Public Safety Site Channels within Channels 1-150 and 401-600 in the top eleven (11) EA markets used by the Commission to determine Nextel's average 800 MHz spectrum holdings throughout the U.S.[31] Overlaying such average coverage areas over the 2000 U.S. Census Tract, we also determined the average population covered by these licenses. Since the *Report and Order* relocates these Non-Nextel Site Channels into the Interleave Channels presently held and to be vacated by the Nextel Control Group, we then determined the average (1) actual coverage area and (2) protected service area as measured by a 22 dBu contour of the NCG's Lower 80 EA and Site and BILT Site Channels in the eleven (11) EA markets. Overlaying such average

[28] *See* n. 6 *infra*.
[29] *See Report and Order*, at ¶ 325 & n. 743.
[30] *See id.*, at ¶¶ 162-163. To alleviate the resulting "crowding" caused by moving the Non-Nextel EA and Cellular-Architecture System licensees' EA- and qualifying Site-Licensed Spectrum to the Upper 200 Channels already occupied by the Nextel Control Group, the Commission adopted a *pro rata* distribution approach to resolve disputes between the relocated licensees and the NCG.
[31] *See* n. 16 *infra*.

coverage areas over the 2000 U.S. Census Tract, we then determined the average population covered by these licenses. Where the NCG's Lower 80 EA authorizations were encumbered by a previously granted Site license held by a Non-Nextel licensee, we subtracted such Site license's area and population coverage from that of the Nextel Control Group's Lower 80 EA Authorization to determine its correct coverage figures.

We then compiled such database into the Non-Nextel Site SMR, BILT and Public Safety Licenses' Spreadsheet as **Schedule 1** hereto.

**III. Discussion.**

A. Bifurcation of 800 MHz PLMRB

1. General Movement of SMR, BILT and Public Safety Site Licenses

a. Within Channels 1-150

The *Report and Order* relocates SMR, BILT and Public Safety Site Channels within Channels 1-150 to the Interleave Channels (Channels 151-400) presently held and to be vacated by the Nextel Control Group on a geographic "footprint" basis.[32] SMR licensees hold an average of twenty-four (24) Site Channels, or 1.2 MHz, within Channels 1-150. However, in forty-nine (49) EA markets in which 174,792,406 persons reside, such licensees hold an average of fifty-three (53) Site Channels, or 2.65 MHz. BILT licensees hold an average of fourteen (14) Site Channels, or .7 MHz, within Channels 1-150. However, in the forty-nine (49) more "heavily congested" EA markets, such licensees hold an average of thirty-three (33) Site Channels, or 1.65 MHz. Public safety licensees hold an average of thirteen (13) Site Channels, or .65 MHz within Channels 1-150. However, in the forty-nine (49) more "heavily congested" EA markets, such licensees hold an average of twenty-nine (29) Site Channels, or 1.45 MHz.

The Nextel Control Group holds an average of seventy-nine (79) total Lower 80 Channels and fifty-two (52) Clean Lower 80 Channels. The NCG holds an average of thirty-three (33) total BILT Channels. The NCG holds no Clean BILT Channels in any EA market.

On average, SMR, BILT and Public Safety licensees' fifty-one (51) Site Channels, or 2.55 MHz, within Channels 1-150 apparently can be relocated to the Lower 80 EA authorizations and Site Channels and the BILT Site Channels comprising an average of one hundred twelve (112) Channels, or 5.6 MHz, presently held and to be vacated by the NCG.

In determining whether SMR, BILT and Public Safety licensees are relocated to "comparable facilities" as required by previous Commission decisions,[33] the FCC requires that such licensees receive coextensive geographical and population coverage.[34] The problem here is that the NCG's Site Channels within the Interleave Channels (Channels 151-400) to be vacated often have smaller geographical coverage areas or "footprints" than those of the SMR, BILT and Public Safety licensees' spectrum holdings within Channels 1-150 to be relocated. As a result, in

[32] *See Report and Order*, at ¶¶ 23, 151 and 198.
[33] *See SMR Second Report and Order*, at 19112-13 ¶ 92.
[34] *See id*.

certain of these one hundred twenty-eight (128) EA markets, the *Report and Order*'s relocation approach fails to provide these Site licensees "equivalent channel capacity" and thus "comparable facilities" as required by Commission precedent and the *Report and Order* itself.[35]

Moreover, problems clearly arise in the forty-nine (49) more "heavily congested" EA markets. In these EA markets, the SMR, BILT and Public Safety licensees hold an average of one hundred fifteen (115) Channels, or 5.75 MHz. As noted above, the Nextel Control Group holds an average of one hundred twelve (112) Channels, or 5.6 MHz. As a result, in these more "heavily congested" EA markets, the NCG lacks the Lower 80 EA and Site Channels and BILT Site Channels to accommodate the *Report and Order*'s relocation of SMR, BILT and Public Safety licensees' Site Channels within Channels 1-150.

b. Within Upper 200 Channels (Channels 401-600)

Although the *Report and Order* is unclear on this point, based upon its central premise that separation of dissimilar system architectures will minimize, if not eliminate the intermodulation interference experienced by Public Safety and other high-site and high power systems within the 800 MHz band,[36] we believe that the better view is that SMR, BILT and Public Safety Site licenses within the Upper 200 Channels not held by an EA or Cellular-Architecture System licensee, or otherwise not qualifying for relocation to the new Cellular Block,[37] will be moved to the Interleave Channels (Channels 151-400) presently held and to be vacated by the NCG on a geographic "footprint" basis.

SMR licensees hold an average of twenty-nine (29) Site Channels within Channels 401-600. However, in forty-nine (49) EA markets in which 174,792,406 persons reside, such licensees hold an average of forty-nine (49) Site Channels, or 2.65 MHz. BILT licensees hold an average of two (2) Site Channels within Channels 401-600, or .1 MHz. However, in the forty-nine (49) more "heavily congested" EA markets, such licensees hold an average of four (4) Site Channels, or .2 MHz. Public safety licensees hold an average of less than one (1) Site Channel, or .05 MHz, within Channels 401-600. In the forty-nine (49) more "heavily congested" EA markets, such licensees hold an average of less than one (1) Site Channel, or .05 MHz.

The relocation of SMR, BILT and Public Safety licensees' Site Channels within Channels 401-600 does not change the conclusion set forth above with respect to whether the Nextel Control Group on average holds sufficient Lower 80 EA- and Site-Licensed Spectrum and BILT Site Channels to accommodate the *Report and Order*'s relocation of SMR, BILT and Public Safety licensees' Site Channels. However, with respect to the forty-nine (49) more "heavily congested" EA markets, such relocation of the SMR, BILT and Public Safety licensees' Site Channels within Channels 401-600 exacerbates the already overcrowded spectrum. With such relocation, an average of fifty-four (54) additional Site Channels, or 2.7 MHz, would be moved into the Lower 80 EA and Site Channels and BILT Site Channels presently held and to be vacated by the NCG. Together with the relocation of SMR, BILT and Public Safety Site Channels within Channels 1-150, such relocation would result in an average excess of fifty-seven

[35] *See Report and Order*, at ¶ 201 & n. 537.
[36] *See id.*, at ¶¶ 151-158.
[37] *See id.*, at ¶ 163.

(57) Channels or 2.85 MHz of spectrum over the EA- and Site-Licensed Spectrum held and to be relocated by the Nextel Control Group in the Interleave Channels.

We also examined a "best case" scenario which assumes all of the geographic "footprints" of the Nextel Control Group's BILT Site Channels match those of the Non-Nextel SMR, BILT and Public Safety licenses within Channels 1-150 and 401-600 to be relocated under the *Report and Order*. As the Non-Nextel Site Licenses spreadsheet attached hereto as **Schedule 1** indicates, in thirty-eight (38) EA markets in which 103.18 million persons, or approximately thirty-six percent (36%) of the total U.S. population resides the NCG lacks sufficient spectrum holdings to accommodate the *Report and Order*'s relocation of the Non-Nextel Site licensees.

2. Movement of Non-Nextel EA and Cellular-Architecture System Licensees' EA- and Qualifying Site-Licensed Spectrum.

As noted above, the *Report and Order* seeks to minimize the intermodulation interference experienced by Public Safety and other high-site and high-power systems from the operations of low-site and low-power digital cellular systems by separating them into two separate blocks: (1) Non-Cellular (Channels 1-440 or 806-816.9875 MHz/851-861.9875 MHz); and (2) Cellular (Channels 441-720 or 817-824 MHz/862-869 MHz).[38] *The Report and Order* reserved the former NPSPAC Channels (Channels 601-720 or 822-824.9875/MHz 866-868.9875 MHz) to the Nextel Control Group.[39] As a result, the *Report and Order* relocated the Non-Nextel EA licensees' EA- and qualifying Site-Licensed Spectrum and Cellular-Architecture System licensees' Site Channels to the Upper 200 Channels Spectrum (Channels 401-600) presently held by the NCG.

For purposes of this analyzing whether the NCG holds sufficient spectrum within the Upper 200 Channels to accommodate the relocation set forth in the *Report and Order*, we assumed that the Non-Nextel SMR, BILT and Public Safety Site licenses within Channels 410-600 would not be relocated to the Interleave Channels (Channels 151-400) held by the NCG and to be vacated.

As the Nextel Control Group Upper 200 Channels Spreadsheet attached hereto as **Exhibit C** indicates, Nextel or Nextel Partners holds an average of one hundred sixty-eight (168) Clean Upper 200 Channels throughout the U.S. However, in forty (40) "heavily congested" EA markets, Nextel holds an average of only one hundred fifty-five (155) such Clean Channels.[40] As noted above, the *Report and Order* relocates the Non-Nextel EA licensees' EA authorizations and qualifying Site Channels and the Cellular-Architecture System licensee' qualifying Site Channels to the Upper 200 Channels held by the Nextel Control Group on an EA market wide Clean and 1:1 basis. In the one hundred thirty-five (135) "less congested" EA markets, Nextel or Nextel Partners has sufficient spectrum within the Upper 200 Channels to accommodate the *Report and Order's* relocation of Non-Nextel EA and qualifying Site-Licensed Spectrum.

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[38] *See* n. 17 *infra.*

[39] *See* n. 12 *infra*.

[40] For purposes of determining "heavily congested" EA markets in this context, we focused upon EA markets in which following the relocation of Non-Nextel EA- and qualifying Site-Licensed Spectrum, Nextel or Nextel Partners would hold fewer than eighty (80) channels within the Upper 200 Channels.

However, in the forty (40) "heavily congested" EA markets, in which 64,288,606 persons reside, Nextel or Nextel Partners lacks sufficient spectrum to accommodate the *Report and Order's* relocation without requiring them to vacate 120-200 channels within the Upper 200 Channels and thereby lose considerable sufficient system capacity in these EA markets.[41]

B. Recommendations.

Based upon the above discussion, the *Report and Order*'s relocation of SMR, BILT and Public Safety Site licensees' spectrum holdings within Channels 1-150 and the Upper 200 Channels (Channels 401-600) is practically and even mathematically flawed. Moreover, the *Report and Order*'s treatment of Non-Nextel EA and Cellular-Architecture System licensees' EA- and qualifying Site-Licensed Spectrum appears similarly flawed, particularly if the Commission interprets the *Report and Order* to not requiring SMR, BILT and Public Safety licensees to relocate their respective Site spectrum holdings from the Upper 200 Channels. To remedy these practical and mathematical flaws, we would recommend that the FCC consider the following alternatives:

- Relocate SMR, BILT and Public Safety Site Licensees' respective spectrum holdings from Channels 1-150 to the Interleave Channels (Channels 151-400) presently held and to be vacated by the Nextel Control Group; in EA markets where the NCG lacks sufficient spectrum to accommodate such relocation, move the excess relocated Site Channels first to the Expansion Band, and then if such excess Channels remain, then to the Guard Band in a particular EA market.

- Relocate SMR, BILT and Public Safety Site Channels within the Upper 200 Channels (Channels 401-600) to the Interleaved Channels presently held and to be vacated by the Nextel Control Group; in EA markets where the NCG lacks sufficient spectrum to accommodate such relocation, move the excess relocated Site Channels first to the Expansion Band, and then if such excess Channels remain, then to the Guard Band in a particular EA market.

- Relocate the Non-Nextel EA and Cellular-Architecture System licensees' EA- and qualifying Site-Licensed Spectrum initially to the former NPSPAC Channels on an EA market wide Clean and 1:1 basis. If such Channels are insufficient to accommodate the relocation of the Non-Nextel EA and Cellular-Architecture System licensees' Spectrum, these licensees should be entitled to elect to move the excess of such relocated Spectrum either to (1) the 1.9 GHz band spectrum (1,910-1,915 MHz/1,990-1,995 MHz) or (2) the Upper 200 Channels (Channels 401-600) on an EA market wide Clean and 1:1 basis.

[41] *See* n. 19 *infra*.

EXHIBIT B

COMPARISON CHANNEL MOVEMENT CHARTS

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**GENERAL CATEGORY LICENSES**
**(CHANNELS 1-150)**
**GENERAL CATEGORY EA LICENSEES**
**EITHER HAVE CONSTRUCTED OR HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| "General" D - Block (25 Ch.) | 851 | .0125 | NPSPAC (IF FULL FUNDING TO PAY COST OF NPSPAC RELOCATION: OTHER-WISE NEXTEL ONLY) | | NPSPAC | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| "General" DD - Block (25 Ch.) | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| "General" DD - Block (cont.) | 852 | .0125 | | | | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| "General" E - Block (25 Ch.) | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| "General" EE - Block (25 Ch.) | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**GENERAL CATEGORY LICENSES**
**(CHANNELS 1-150)**
**GENERAL CATEGORY EA LICENSEES**
**EITHER HAVE CONSTRUCTED OR HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| "General" EE - Block (cont.) | 853 | .0125 | NPSPAC | | NPSPAC | |
| | " | .0375 | | | | |
| | " | .0625 | (IF FULL FUNDING TO | | | |
| | " | .0875 | PAY COST OF NPSPAC | | | |
| | " | .1125 | RELOCATION: OTHER- | | | |
| | " | .1375 | WISE NEXTEL ONLY) | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| "General" F - Block (25 Ch.) | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | GENERAL CATEGORY EA MARKET AUTHORIZATIONS (IF SPACE AVAILABLE; OTHERWISE PUBLIC | UNCERTAIN MARKET SPECIFIC | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| "General" F - Block (cont.) | 854 | .0125 | SAFETY AND OTHER SITE-SPECIFIC GENERAL CATEGORY POOL LICENSES) | | PUBLIC SAFETY ADDITIONAL 30 CHANNELS | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| "General" FF - Block (25 Ch.) | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |

**CONSENSUS PROPOSAL TOTALS:** **120-150** CHANNELS + EXACT NUMBER UNCERTAIN
CHANNELS 121-150 MARKET SPECIFIC

**PREFERRED IMPROVEMENTS** **150**

**30** NEW ALLOCATION OF PUBLIC SAFETY CHANNELS

# Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**GENERAL CATEGORY LICENSES**
**(CHANNELS 1-150)**
**GENERAL CATEGORY EA LICENSEES**
**HAVE NOT CONSTRUCTED AND DO NOT HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| "General" D - Block (25 Ch.) | 851 | .0125 | NPSPAC<br><br>(IF FULL FUNDING TO PAY COST OF NPSPAC RELOCATION: OTHERWISE NEXTEL ONLY) | | NPSPAC | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| "General" DD - Block (25 Ch.) | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| "General" DD - Block (cont.) | 852 | .0125 | | | | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| "General" E - Block (25 Ch.) | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |

# Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**GENERAL CATEGORY LICENSES**
**(CHANNELS 1-150)**
**GENERAL CATEGORY EA LICENSEES**
**HAVE NOT CONSTRUCTED AND DO NOT HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| "General" EE - Block (cont.) | 853 | .0125 | NPSPAC (IF FULL FUNDING TO PAY COST OF NPSPAC RELOCATION: OTHERWISE NEXTEL ONLY) | | NPSPAC | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| "General" F - Block (25 Ch.) | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| "General" F - Block (25 Ch.) (cont.) | " | .8875 | GENERAL CATEGORY EA MARKET AUTHORIZATIONS (IF SPACE AVAILABLE; OTHERWISE PUBLIC | UNCERTAIN MARKET SPECIFIC | PUBLIC SAFETY | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | **.9875** | | | | |
| "General" F - Block | 854 | .0125 | SAFETY AND OTHER SITE-SPECIFIC GENERAL CATEGORY POOL LICENSES) | | | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |

**CONSENSUS PROPOSAL TOTALS:** **120-150** CHANNELS + EXACT NUMBER UNCERTAIN
CHANNELS 121-150 MARKET SPECIFIC

**PREFERRED IMPROVEMENTS** **150**

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**INTERLEAVE CHANNELS (151-400)**
**ASSUMES THAT GENERAL CATEGORY & LOWER 80 EA LICENSEES HAVE NOT CONSTRUCTED AND DO NOT HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| B/ILT (8 Ch.) | " | .7625 | B/ILT (8 Ch.) | | B/ILT (8 Ch.) | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| Public Safety | " | .9625 | PUBLIC SAFETY (2 Ch.) | | PUBLIC SAFETY (2 Ch.) | |
| | " | .9875 | | | | |
| B/ILT (8 Ch.) | 855 | .0125 | B/ILT (8 Ch.) | | B/ILT (8 Ch.) | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| Public Safety | " | .2125 | PUBLIC SAFETY (2 Ch.) | | PUBLIC SAFETY (2 Ch.) | |
| | " | .2375 | | | | |
| B/ILT (8 Ch.) | " | .2625 | B/ILT (8 Ch.) | | B/ILT (8 Ch.) | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| Public Safety | " | .4625 | PUBLIC SAFETY (2 Ch.) | | PUBLIC SAFETY (2 Ch.) | |
| | " | .4875 | | | | |
| B/ILT (8 Ch.) | " | .5125 | B/ILT (8 Ch.) | | B/ILT (8 Ch.) | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| Public Safety | " | .7125 | PUBLIC SAFETY (2 Ch.) | | PUBLIC SAFETY (2 Ch.) | |
| | " | .7375 | | | | |
| B/ILT (8 Ch.) | " | .7625 | B/ILT (8 Ch.) | | B/ILT (8 Ch.) | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| Public Safety | " | .9625 | PUBLIC SAFETY (2 Ch.) | | PUBLIC SAFETY | |
| | " | .9875 | | | | |
| G-Block | 856 | .0125 | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: GC EA AUTHS. THEN PS & B/ILT (8 Ch.) | | | NEW PUBLIC SAFETY ALLOCATION (8 Ch.) |
| H-Block | " | .0375 | | | | |
| I-Block | " | .0625 | | | | |
| J-Block | " | .0875 | | | | |
| K-Block | " | .1125 | | | | |
| L-Block | " | .1375 | | | | |
| M-Block | " | .1625 | | | | |
| N-Block | " | .1875 | | | | |
| Public Safety (3 Ch.) | " | .2125 | PUBLIC SAFETY (3 CH.) | | (13 Ch.) | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| B/ILT (6 Ch.) | " | .2875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| Public Safety (3 Ch.) | " | .4375 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| "L-4"- O | " | .5125 | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: GC EA AUTHS. THEN PS & B/ILT (8 Ch.) | | | NEW PUBLIC SAFETY ALLOCATION (8 Ch.) |
| "L-4"- P | " | .5375 | | | | |
| "L-4"- Q | " | .5625 | | | | |
| "L-4"- R | " | .5875 | | | | |
| "L-4"- S | " | .6125 | | | | |
| "L-4"- T | " | .6375 | | | | |
| "L-4"- U | " | .6625 | | | | |
| "L-4"- V | " | .6875 | | | | |
| Public Safety (3 Ch.) | " | .7125 | PUBLIC SAFETY (3 Ch.) | | (14 Ch.) | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| B/ILT (6 Ch.) | " | .7875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**INTERLEAVE CHANNELS (151-400)**
**ASSUMES THAT GENERAL CATEGORY & LOWER 80 EA LICENSEES HAVE NOT CONSTRUCTED AND DO NOT HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| Public Safety (3 Ch.) | " | .9375 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| G-Block | 857 | .0125 | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: GC EA AUTHS. THEN PS & B/ILT (8 Ch.) | | | NEW PUBLIC SAFETY ALLOCATION (8 Ch.) |
| H-Block | " | .0375 | | | | |
| I-Block | " | .0625 | | | | |
| J-Block | " | .0875 | | | | |
| K-Block | " | .1125 | | | | |
| L-Block | " | .1375 | | | | |
| M-Block | " | .1625 | | | | |
| N-Block | " | .1875 | | | | |
| Public Safety (3 Ch.) | " | .2125 | PUBLIC SAFETY (3 Ch.) | | (14 Ch.) | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| B/ILT (6 Ch.) | " | .2875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| Public Safety (3 Ch.) | " | .4375 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| O-Block | " | .5125 | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: GC EA AUTHS. THEN PS & B/ILT (8 Ch.) | | | NEW PUBLIC SAFETY ALLOCATION (8 Ch.) |
| P-Block | " | .5375 | | | | |
| Q-Block | " | .5625 | | | | |
| R-Block | " | .5875 | | | | |
| S-Block | " | .6125 | | | | |
| T-Block | " | .6375 | | | | |
| U-Block | " | .6625 | | | | |
| V-Block | " | .6875 | | | | |
| Public Safety (3 Ch.) | " | .7125 | PUBLIC SAFETY (3 Ch.) | | (14 Ch.) | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| B/ILT (6 Ch.) | " | .7875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| Pubic Safety (3 Ch.) | " | .9375 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| G-Block | 858 | .0125 | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: GC EA AUTHS. THEN PS & B/ILT (8 Ch.) | | | NEW PUBLIC SAFETY ALLOCATION (8 Ch.) |
| H-Block | " | .0375 | | | | |
| I-Block | " | .0625 | | | | |
| J-Block | " | .0875 | | | | |
| K-Block | " | .1125 | | | | |
| L-Block | " | .1375 | | | | |
| M-Block | " | .1625 | | | | |
| N-Block | " | .1875 | | | | |
| Public Safety (3 Ch.) | " | .2125 | PUBLIC SAFETY (3 Ch.) | | (14 Ch.) | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| B/ILT (6 Ch.) | " | .2875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| Public Safety (3 Ch.) | " | .4375 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| O-Block | " | .5125 | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: GC EA AUTHS. THEN PS & B/ILT (8 Ch.) | | B/ILT (8 Ch.) | NEW B/ILT ALLOCATION (8 Ch.) |
| P-Block | " | .5375 | | | | |
| Q-Block | " | .5625 | | | | |
| R-Block | " | .5875 | | | | |
| S-Block | " | .6125 | | | | |
| T-Block | " | .6375 | | | | |
| U-Block | " | .6625 | | | | |
| V-Block | " | .6875 | | | | |
| Public Safety (3 Ch.) | " | .7125 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| B/ILT (6 Ch.) | " | .7875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| Public Safety (3 Ch.) | " | .9375 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**INTERLEAVE CHANNELS (151-400)**
**ASSUMES THAT GENERAL CATEGORY & LOWER 80 EA LICENSEES HAVE NOT CONSTRUCTED AND DO NOT HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| G-Block | 859 | .0125 | MIXED USE PUBLIC SAFETY BILT AND GENERAL CATEGORY SITE-SPECIFIC LICENSES FROM CHANNELS 1-120 (11 Ch.) | | B/ILT (8 Ch.) | NEW B/ILT ALLOCATION (8 Ch.) |
| H-Block | " | .0375 | | | | |
| I-Block | " | .0625 | | | | |
| J-Block | " | .0875 | | | | |
| K-Block | " | .1125 | | | | |
| L-Block | " | .1375 | | | | |
| M-Block | " | .1625 | | | | |
| N-Block | " | .1875 | | | | |
| Public Safety (3 Ch.) | " | .2125 | | | PUBLIC SAFETY (3 Ch.) | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| B/ILT (6 Ch.) | " | .2875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| Public Safety (3 Ch.) | " | .4375 | MIXED USE PUBLIC SAFETY BILT AND GENERAL CATEGORY SITE-SPECIFIC LICENSES FROM CHANNELS 1-120 (14 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| O-Block | " | .5125 | | | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: IN MOST EA MARKETS AVAILABLE FOR B/ILT | MARKET SPECIFIC (8 Ch.) |
| P-Block | " | .5375 | | | | |
| Q-Block | " | .5625 | | | | |
| R-Block | " | .5875 | | | | |
| S-Block | " | .6125 | | | | |
| T-Block | " | .6375 | | | | |
| U-Block | " | .6625 | | | | |
| V-Block | " | .6875 | | | | |
| Public Safety (3 Ch.) | " | .7125 | | | PUBLIC SAFETY (3 Ch.) | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| B/ILT (6 Ch.) | " | .7875 | B/ILT (6 Ch.) | | B/ILT (6Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| Public Safety (3 Ch.) | " | .9375 | (3 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| G-Block | 860 | .0125 | MIXED USE PUBLIC SAFETY BILT AND GENERAL CATEGORY SITE-SPECIFIC LICENSES FROM CHANNELS 1-120 (11 Ch.) | | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: (8 Ch.) | NEW SMR ALLOCATION (8 Ch.) |
| H-Block | " | .0375 | | | | |
| I-Block | " | .0625 | | | | |
| J-Block | " | .0875 | | | | |
| K-Block | " | .1125 | | | | |
| L-Block | " | .1375 | | | | |
| M-Block | " | .1625 | | | | |
| N-Block | " | .1875 | | | | |
| Public Safety (3 Ch.) | " | .2125 | | | PUBLIC SAFETY (3 Ch.) | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| B/ILT (6 Ch.) | " | .2875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| Public Safety (3 Ch.) | " | .4375 | MIXED USE PUBLIC SAFETY BILT AND GENERAL CATEGORY SITE-SPECIFIC LICENSES FROM CHANNELS 1-120 (14 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| O-Block | " | .5125 | | | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: (8 Ch.) | NEW SMR ALLOCATION (8 Ch.) |
| P-Block | " | .5375 | | | | |
| Q-Block | " | .5625 | | | | |
| R-Block | " | .5875 | | | | |
| S-Block | " | .6125 | | | | |
| T-Block | " | .6375 | | | | |
| U-Block | " | .6625 | | | | |
| V-Block | " | .6875 | | | | |
| Public Safety (3 Ch.) | " | .7125 | | | PUBLIC SAFETY (3 Ch.) | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| B/ILT (6 Ch.) | " | .7875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| Public Safety (3 Ch.) | " | .9375 | (3 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |

**CONSENSUS PROPOSAL:** 94-105 CHANNELS
**NEW ALLOCATION OF PUBLIC SAFETY SPECTRUM:** 50 CHANNELS

**PREFERRED IMROVEMENTS:** 48 CHANNELS
**NEW ALLOCATION OF PUBLIC SAFETY SPECTRUM:** 40 CHANNELS
**NEW ALLOCATION OF B/ILT SPECTRUM:** 16 CHANNELS

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**INTERLEAVE CHANNELS (151-400)**
**ASSUMES THAT GENERAL CATEGORY & LOWER 80 EA LICENSEES**
**EITHER HAVE CONSTRUCTED OR HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| B/ILT | " | .7625 | B/ILT | | B/ILT | |
| (8 Ch.) | " | .7875 | (8 Ch.) | | (8 Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| Public | " | .9625 | PUBLIC SAFETY | | PUBLIC SAFETY | |
| Safety | " | .9875 | (2 Ch.) | | (2 Ch.) | |
| B/ILT | 855 | .0125 | B/ILT | | B/ILT | |
| (8 Ch.) | " | .0375 | (8 Ch.) | | (8 Ch.) | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| Public | " | .2125 | PUBLIC SAFETY | | PUBLIC SAFETY | |
| Safety | " | .2375 | (2 Ch.) | | (2 Ch.) | |
| B/ ILT | " | .2625 | B/ILT | | B/ILT | |
| (8 Ch.) | " | .2875 | (8 Ch.) | | (8 Ch.) | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| Public | " | .4625 | PUBLIC SAFETY | | PUBLIC SAFETY | |
| Safety | " | .4875 | (2 Ch.) | | (2 Ch.) | |
| B/ ILT | " | .5125 | B/ILT | | B/ILT | |
| (8 Ch.) | " | .5375 | (8 Ch.) | | (8 Ch.) | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| Public | " | .7125 | PUBLIC SAFETY | | PUBLIC SAFETY | |
| Safety | " | .7375 | (2 Ch.) | | (2 Ch.) | |
| B/ ILT | " | .7625 | B/ILT | | B/ILT | |
| (8 Ch.) | " | .7875 | (8 Ch.) | | (8 Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| Public | " | .9625 | PUBLIC SAFETY | | PUBLIC SAFETY | |
| Safety | " | .9875 | (2 Ch.) | | | |
| G-Block | 856 | .0125 | LOWER 80 SITE-SPECIFIC | | | NEW |
| H-Block | " | .0375 | (NON-NEXTEL) THEN | | | PUBLIC |
| I-Block | " | .0625 | RELOCATIONS: | | | SAFETY |
| J-Block | " | .0875 | | | | ALLOCATION |
| K-Block | " | .1125 | GC EA | | | |
| L-Block | " | .1375 | AUTHS. THEN | | | (8 Ch.) |
| M-Block | " | .1625 | PS & B/ILT | | | |
| N-Block | " | .1875 | (8 Ch.) | | | |
| Public | " | .2125 | PUBLIC SAFETY | | | |
| Safety | " | .2375 | (3 CH.) | | (13 Ch.) | |
| (3 Ch.) | " | .2625 | | | | |
| B/ ILT | " | .2875 | B/ILT | | B/ILT | |
| (6 Ch.) | " | .3125 | (6 Ch.) | | (6 Ch.) | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| Public | " | .4375 | PUBLIC SAFETY | | PUBLIC SAFETY | |
| Safety | " | .4625 | (3 Ch.) | | | |
| (3 Ch.) | " | .4875 | | | | |
| "L-4"- O | " | .5125 | LOWER 80 SITE-SPECIFIC | | | NEW |
| "L-4"- P | " | .5375 | (NON-NEXTEL) THEN | | | PUBLIC |
| "L-4"- Q | " | .5625 | RELOCATIONS: | | | SAFETY |
| "L-4"- R | " | .5875 | | | | ALLOCATION |
| "L-4"- S | " | .6125 | GC EA | | | |
| "L-4"- T | " | .6375 | AUTHS. THEN | | | (8 Ch.) |
| "L-4"- U | " | .6625 | PS & B/ILT | | | |
| "L-4"- V | " | .6875 | (8 Ch.) | | | |
| Public | " | .7125 | PUBLIC SAFETY | | (14 Ch.) | |
| Safety | " | .7375 | (3 Ch.) | | | |
| (3 Ch.) | " | .7625 | | | | |
| B/ ILT | " | .7875 | B/ILT | | B/ILT | |
| (6 Ch.) | " | .8125 | (6 Ch.) | | (6 Ch.) | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| Public | " | .9375 | PUBLIC SAFETY | | PUBLIC SAFETY | |
| Safety | " | .9625 | (3 Ch.) | | | |
| (3 Ch.) | " | .9875 | | | | |

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**INTERLEAVE CHANNELS (151-400)**
**ASSUMES THAT GENERAL CATEGORY & LOWER 80 EA LICENSEES EITHER HAVE CONSTRUCTED OR HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| G-Block | 857 | .0125 | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: GC EA AUTHS. THEN PS & B/ILT (8 Ch.) | | | NEW PUBLIC SAFETY ALLOCATION (8 Ch.) |
| H-Block | " | .0375 | | | | |
| I-Block | " | .0625 | | | | |
| J-Block | " | .0875 | | | | |
| K-Block | " | .1125 | | | | |
| L-Block | " | .1375 | | | | |
| M-Block | " | .1625 | | | | |
| N-Block | " | .1875 | | | | |
| Public Safety (3 Ch.) | " | .2125 | PUBLIC SAFETY (3 Ch.) | | (14 Ch.) | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| B/ ILT (6 Ch.) | " | .2875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| Public Safety (3 Ch.) | " | .4375 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| O-Block | " | .5125 | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: GC EA AUTHS. THEN PS & B/ILT (8 Ch.) | | | NEW PUBLIC SAFETY ALLOCATION (8 Ch.) |
| P-Block | " | .5375 | | | | |
| Q-Block | " | .5625 | | | | |
| R-Block | " | .5875 | | | | |
| S-Block | " | .6125 | | | | |
| T-Block | " | .6375 | | | | |
| U-Block | " | .6625 | | | | |
| V-Block | " | .6875 | | | | |
| Public Safety (3 Ch.) | " | .7125 | PUBLIC SAFETY (3 Ch.) | | (14 Ch.) | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| B/ ILT (6 Ch.) | " | .7875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| Pubic Safety (3 Ch.) | " | .9375 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| G-Block | 858 | .0125 | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: GC EA AUTHS. THEN PS & B/ILT (8 Ch.) | | | NEW PUBLIC SAFETY ALLOCATION (8 Ch.) |
| H-Block | " | .0375 | | | | |
| I-Block | " | .0625 | | | | |
| J-Block | " | .0875 | | | | |
| K-Block | " | .1125 | | | | |
| L-Block | " | .1375 | | | | |
| M-Block | " | .1625 | | | | |
| N-Block | " | .1875 | | | | |
| Public Safety (3 Ch.) | " | .2125 | PUBLIC SAFETY (3 Ch.) | | (14 Ch.) | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| B/ ILT (6 Ch.) | " | .2875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| Public Safety (3 Ch.) | " | .4375 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| O-Block | " | .5125 | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: GC EA AUTHS. THEN PS & B/ILT (8 Ch.) | | B/ILT (8 Ch.) | NEW B/ILT ALLOCATION (8 Ch.) |
| P-Block | " | .5375 | | | | |
| Q-Block | " | .5625 | | | | |
| R-Block | " | .5875 | | | | |
| S-Block | " | .6125 | | | | |
| T-Block | " | .6375 | | | | |
| U-Block | " | .6625 | | | | |
| V-Block | " | .6875 | | | | |
| Public Safety (3 Ch.) | " | .7125 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| B/ ILT (6 Ch.) | " | .7875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**INTERLEAVE CHANNELS (151-400)**
**ASSUMES THAT GENERAL CATEGORY & LOWER 80 EA LICENSEES EITHER HAVE CONSTRUCTED OR HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| Public Safety (3 Ch.) | " | .9375 | PUBLIC SAFETY (3 Ch.) | | PUBLIC SAFETY | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| G-Block | 859 | .0125 | MIXED USE PUBLIC SAFETY BILT AND GENERAL CATEGORY SITE-SPECIFIC LICENSES FROM CHANNELS 1-120 (11 Ch.) | | B/ILT (8 Ch.) | NEW B/ILT ALLOCATION (8 Ch.) |
| H-Block | " | .0375 | | | | |
| I-Block | " | .0625 | | | | |
| J-Block | " | .0875 | | | | |
| K-Block | " | .1125 | | | | |
| L-Block | " | .1375 | | | | |
| M-Block | " | .1625 | | | | |
| N-Block | " | .1875 | | | | |
| Public Safety (3 Ch.) | " | .2125 | | | PUBLIC SAFETY (3 Ch.) | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| B/ILT (6 Ch.) | " | .2875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| Public Safety (3 Ch.) | " | .4375 | MIXED USE PUBLIC SAFETY BILT AND GENERAL CATEGORY SITE-SPECIFIC LICENSES FROM CHANNELS 1-120 (14 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| O-Block | " | .5125 | | | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: IN MOST EA MARKETS AVAILABLE FOR B/ILT | MARKET SPECIFIC (8 Ch.) |
| P-Block | " | .5375 | | | | |
| Q-Block | " | .5625 | | | | |
| R-Block | " | .5875 | | | | |
| S-Block | " | .6125 | | | | |
| T-Block | " | .6375 | | | | |
| U-Block | " | .6625 | | | | |
| V-Block | " | .6875 | | | | |
| Public Safety (3 Ch.) | " | .7125 | | | PUBLIC SAFETY (3 Ch.) | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| B/ILT (6 Ch.) | " | .7875 | B/ILT (6 Ch.) | | B/ILT (6Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| Public Safety (3 Ch.) | " | .9375 | (3 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| G-Block | 860 | .0125 | MIXED USE PUBLIC SAFETY BILT AND GENERAL CATEGORY SITE-SPECIFIC LICENSES FROM CHANNELS 1-120 (11 Ch.) | | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: (8 Ch.) | NEW SMR ALLOCATION (8 Ch.) |
| H-Block | " | .0375 | | | | |
| I-Block | " | .0625 | | | | |
| J-Block | " | .0875 | | | | |
| K-Block | " | .1125 | | | | |
| L-Block | " | .1375 | | | | |
| M-Block | " | .1625 | | | | |
| N-Block | " | .1875 | | | | |
| Public Safety (3 Ch.) | " | .2125 | | | PUBLIC SAFETY (3 Ch.) | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| B/ILT (6 Ch.) | " | .2875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| Public Safety (3 Ch.) | " | .4375 | MIXED USE PUBLIC SAFETY BILT AND GENERAL CATEGORY SITE-SPECIFIC LICENSES FROM CHANNELS 1-120 (14 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| O-Block | " | .5125 | | | LOWER 80 SITE-SPECIFIC (NON-NEXTEL) THEN RELOCATIONS: (8 Ch.) | NEW SMR ALLOCATION (8 Ch.) |
| P-Block | " | .5375 | | | | |
| Q-Block | " | .5625 | | | | |
| R-Block | " | .5875 | | | | |
| S-Block | " | .6125 | | | | |
| T-Block | " | .6375 | | | | |
| U-Block | " | .6625 | | | | |
| V-Block | " | .6875 | | | | |
| Public Safety (3 Ch.) | " | .7125 | | | PUBLIC SAFETY (3 Ch.) | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| B/ILT (6 Ch.) | " | .7875 | B/ILT (6 Ch.) | | B/ILT (6 Ch.) | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| Public Safety (3 Ch.) | " | .9375 | (3 Ch.) | | PUBLIC SAFETY (3 Ch.) | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |

**CONSENSUS PROPOSAL:** 94-105 CHANNELS
**NEW ALLOCATION OF PUBLIC SAFETY SPECTRUM:** 50 CHANNELS

**PREFERRED IMROVEMENTS:** 48 CHANNELS
**NEW ALLOCATION OF PUBLIC SAFETY SPECTRUM:** 40 CHANNELS
**NEW ALLOCATION OF B/ILT SPECTRUM:** 16 CHANNELS

# Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**UPPER 10 CHANNELS LICENSES**
**(CHANNELS 401-600)**
**GENERAL CATEGORY & LOWER 80 EA LICENSEES**
**HAVE NOT CONSTRUCTED AND DO NOT HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| "Upper 10" A - Block (20 Ch.) | 861 | .0125 | SMR CELLULAR<br><br>NEXTEL ONLY | | SMR CELLULAR | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| "Upper 10" B - Block (60 Ch.) | " | .5125 | SMR CELLULAR<br><br>NEXTEL ONLY | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| "Upper 10" B - Block (cont.) | 862 | .0125 | SMR CELLULAR<br><br>NEXTEL ONLY | | SMR CELLULAR | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**UPPER 10 CHANNELS LICENSES**
**(CHANNELS 401-600)**
**GENERAL CATEGORY & LOWER 80 EA LICENSEES**
**HAVE NOT CONSTRUCTED AND DO NOT HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| "Upper 10" C - Block (120 Ch.) | 863 | .0125 | SMR CELLULAR<br><br>NEXTEL ONLY | | SMR CELLULAR | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |
| "Upper 10" C - Block (cont.) | 864 | .0125 | SMR CELLULAR<br><br>NEXTEL ONLY | | SMR CELLULAR | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**UPPER 10 CHANNELS LICENSES**
**(CHANNELS 401-600)**
**GENERAL CATEGORY & LOWER 80 EA LICENSEES**
**HAVE NOT CONSTRUCTED AND DO NOT HAVE FIRM COMMITMENT**

| CURRENT USAGE | | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|---|
| "Upper 10" C - Block (cont.) | 865 | .0125 | SMR CELLULAR<br><br>NEXTEL ONLY | | SMR CELLULAR | |
| | " | .0375 | | | | |
| | " | .0625 | | | | |
| | " | .0875 | | | | |
| | " | .1125 | | | | |
| | " | .1375 | | | | |
| | " | .1625 | | | | |
| | " | .1875 | | | | |
| | " | .2125 | | | | |
| | " | .2375 | | | | |
| | " | .2625 | | | GENERAL CATEGORY EA AUTHS. & SITE-SPECIFIC SMR IF AVAILABLE; IF NOT EA AUTHS. RECEIVE 1.9 GHZ PCS SPECTRUM; SITE-SPECIFIC SMR MOVES TO INTERLEAVE WITH RIGHT TO OPERATE CELLULARIZED SERVICE | |
| | " | .2875 | | | | |
| | " | .3125 | | | | |
| | " | .3375 | | | | |
| | " | .3625 | | | | |
| | " | .3875 | | | | |
| | " | .4125 | | | | |
| | " | .4375 | | | | |
| | " | .4625 | | | | |
| | " | .4875 | | | | |
| | " | .5125 | | | | |
| | " | .5375 | | | | |
| | " | .5625 | | | | |
| | " | .5875 | | | | |
| | " | .6125 | | | | |
| | " | .6375 | | | | |
| | " | .6625 | | | | |
| | " | .6875 | | | | |
| | " | .7125 | | | | |
| | " | .7375 | | | | |
| | " | .7625 | | | | |
| | " | .7875 | | | | |
| | " | .8125 | | | | |
| | " | .8375 | | | | |
| | " | .8625 | | | | |
| | " | .8875 | | | | |
| | " | .9125 | | | | |
| | " | .9375 | | | | |
| | " | .9625 | | | | |
| | " | .9875 | | | | |

**CONSENSUS PROPOSAL TOTALS:** **0 CHANNELS**

**PREFERRED IMROVEMENTS** **30 CHANNELS IF CHANNELS 571-600 AVAILABLE**

# Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**NPSPAC CHANNELS**
**(CHANNELS 601-720)**
**GENERAL CATEGORY & LOWER 80 EA LICENSEES**
**EITHER DO OR DO NOT HAVE FIRM COMMITMENT**

| CURRENT USAGE | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|
| **866** | .0125 | **NEXTEL ONLY (40 Ch.)** | | **GENERAL CATEGORY EA MARKET AUTHORIZATIONS & SITE-SPECIFIC SMR (40 Ch.)** | |
| " | .0375 | | | | |
| " | .0625 | | | | |
| " | .0875 | | | | |
| " | .1125 | | | | |
| " | .1375 | | | | |
| " | .1625 | | | | |
| " | .1875 | | | | |
| " | .2125 | | | | |
| " | .2375 | | | | |
| " | .2625 | | | | |
| " | .2875 | | | | |
| " | .3125 | | | | |
| " | .3375 | | | | |
| " | .3625 | | | | |
| " | .3875 | | | | |
| " | .4125 | | | | |
| " | .4375 | | | | |
| " | .4625 | | | | |
| " | .4875 | | | | |
| " | .5125 | | | | |
| " | .5375 | | | | |
| " | .5625 | | | | |
| " | .5875 | | | | |
| " | .6125 | | | | |
| " | .6375 | | | | |
| " | .6625 | | | | |
| " | .6875 | | | | |
| " | .7125 | | | | |
| " | .7375 | | | | |
| " | .7625 | | | | |
| " | .7875 | | | | |
| " | .8125 | | | | |
| " | .8375 | | | | |
| " | .8625 | | | | |
| " | .8875 | | | | |
| " | .9125 | | | | |
| " | .9375 | | | | |
| " | .9625 | | | | |
| " | .9875 | | | | |
| **867** | .0125 | **NEXTEL ONLY (40 Ch.)** | | **GENERAL CATEGORY EA MARKET AUTHORIZATIONS & SITE-SPECIFIC SMR (40 Ch.)** | |
| " | .0375 | | | | |
| " | .0625 | | | | |
| " | .0875 | | | | |
| " | .1125 | | | | |
| " | .1375 | | | | |
| " | .1625 | | | | |
| " | .1875 | | | | |
| " | .2125 | | | | |
| " | .2375 | | | | |
| " | .2625 | | | | |
| " | .2875 | | | | |
| " | .3125 | | | | |
| " | .3375 | | | | |
| " | .3625 | | | | |
| " | .3875 | | | | |
| " | .4125 | | | | |
| " | .4375 | | | | |
| " | .4625 | | | | |
| " | .4875 | | | | |
| " | .5125 | | | | |
| " | .5375 | | | | |
| " | .5625 | | | | |
| " | .5875 | | | | |
| " | .6125 | | | | |
| " | .6375 | | | | |
| " | .6625 | | | | |
| " | .6875 | | | | |
| " | .7125 | | | | |
| " | .7375 | | | | |
| " | .7625 | | | | |
| " | .7875 | | | | |
| " | .8125 | | | | |
| " | .8375 | | | | |
| " | .8625 | | | | |
| " | .8875 | | | | |
| " | .9125 | | | | |
| " | .9375 | | | | |
| " | .9625 | | | | |
| " | .9875 | | | | |

## Channel Movement Charts of Consensus Parties' Proposal and The Balanced Proposal

**NPSPAC CHANNELS**
**(CHANNELS 601-720)**
**GENERAL CATEGORY & LOWER 80 EA LICENSEES**
**EITHER DO OR DO NOT HAVE FIRM COMMITMENT**

| CURRENT USAGE | | CONSENSUS PROPOSAL | CHANNEL MOVEMENT | PREFERRED IMPROVEMENTS | CHANNEL MOVEMENT |
|---|---|---|---|---|---|
| 868 | .0125 | NEXTEL ONLY (40 Ch.) | | GENERAL CATEGORY EA MARKET AUTHORIZATIONS & SITE-SPECIFIC SMR (40 Ch.) | |
| " | .0375 | | | | |
| " | .0625 | | | | |
| " | .0875 | | | | |
| " | .1125 | | | | |
| " | .1375 | | | | |
| " | .1625 | | | | |
| " | .1875 | | | | |
| " | .2125 | | | | |
| " | .2375 | | | | |
| " | .2625 | | | | |
| " | .2875 | | | | |
| " | .3125 | | | | |
| " | .3375 | | | | |
| " | .3625 | | | | |
| " | .3875 | | | | |
| " | .4125 | | | | |
| " | .4375 | | | | |
| " | .4625 | | | | |
| " | .4875 | | | | |
| " | .5125 | | | | |
| " | .5375 | | | | |
| " | .5625 | | | | |
| " | .5875 | | | | |
| " | .6125 | | | | |
| " | .6375 | | | | |
| " | .6625 | | | | |
| " | .6875 | | | | |
| " | .7125 | | | | |
| " | .7375 | | | | |
| " | .7625 | | | | |
| " | .7875 | | | | |
| " | .8125 | | | | |
| " | .8375 | | | | |
| " | .8625 | | | | |
| " | .8875 | | | | |
| " | .9125 | | | | |
| " | .9375 | | | | |
| " | .9625 | | | | |
| " | .9875 | | | | |

**CONSENSUS PROPOSAL TOTALS:** **120 CHANNELS**

**PREFERRED IMPROVEMENTS:** **120 CHANNELS**

EXHIBIT C

EA MARKETS IN WHICH NEXTEL
HOLDS ALL 800 MHz GENERAL CATEGORY
AND LOWER 80 EA AUTHORIZATIONS

**EA MARKETS WHERE NEXTEL HOLDS ALL OF THE LOWER 230 EA-LICENSED SPECTRUM**

| NEXTEL | | | |
|---|---|---|---|
| **EA Markets** | | | **Pops** |
| 1 | BEA023 | Charlotte-Gastonia-Rock Hill, | |
| 2 | BEA042 | Asheville, NC | |
| 3 | BEA045 | Johnson City-Kingsport-Bristol | |
| 4 | BEA046 | Hickory-Morganton, NC-TN | |
| 5 | BEA052 | Wheeling, WV-OH | |
| 6 | BEA053 | Pittsburgh, PA-WV | |
| 7 | BEA055 | Cleveland-Akron, OH-PA | |
| 8 | BEA056 | Toledo, OH | |
| 9 | BEA057 | Detroit-Ann Arbor-Flint, MI | |
| 10 | BEA058 | Northern Michigan, MI | |
| 11 | BEA061 | Traverse City, MI | |
| 12 | BEA063 | Milwaukee-Racine, WI | |
| 13 | BEA064 | Chicago-Gary-Kenosha, IL-IN-WI | |
| 14 | BEA065 | Elkhart-Goshen, IN-MI | |
| 15 | BEA073 | Memphis, TN-AR-MS-KY | |
| 16 | BEA095 | Jonesboro, AR-MO | |
| 17 | BEA096 | St. Louis, MO-IL | |
| 18 | BEA098 | Columbia, MO | |
| 19 | BEA099 | Kansas City, MO-KS | |
| 20 | BEA131 | Houston-Galveston-Brazoria, TX | |
| 21 | BEA136 | Hobbs, NM-TX | |
| 22 | BEA142 | Scottsbluff, NE-WY | |
| 23 | BEA158 | Phoenix-Mesa, AZ-NM | |
| 24 | BEA159 | Tucson, AZ | |
| 25 | BEA160 | Los Angeles-Riverside-Orange C | |
| 26 | BEA161 | San Diego, CA | |
| 27 | BEA170 | Seattle-Tacoma-Bremerton, WA | |
| 28 | BEA175 | American Samoa | |

EXHIBIT D

EA MARKETS IN WHICH NEXTEL PARTNERS
HOLDS ALL 800 MHz GENERAL CATEGORY
AND LOWER 80 EA AUTHORIZATIONS

**EA MARKETS WHERE NEXTEL PARTNERS HOLDS ALL LOWER 230 EA-LICENSED SPECTRUM**

| NEXTEL PARTNERS | | |
|---|---|---|
| **EA Markets** | | |
| 1 | BEA005 | Albany-Schenectady-Troy, NY |
| 2 | BEA006 | Syracuse, NY-PA |
| 3 | BEA007 | Rochester, NY-PA |
| 4 | BEA008 | Buffalo-Niagara Falls, NY-PA |
| 5 | BEA047 | Lexington, KY-TN-VA-WV |
| 6 | BEA054 | Erie, PA |
| 7 | BEA059 | Green Bay, WI-MI |
| 8 | BEA060 | Appleton-Oshkosh-Neenah, WI |
| 9 | BEA068 | Champaign-Urbana, IL |
| 10 | BEA071 | Nashville, TN-KY |
| 11 | BEA072 | Paducah, KY-IL |
| 12 | BEA090 | Little Rock-North Little Rock, |
| 13 | BEA091 | Fort Smith, AR-OK |
| 14 | BEA100 | Des Moines, IA-IL-MO |
| 15 | BEA103 | Cedar Rapids, IA |
| 16 | BEA104 | Madison, WI-IL-IA |
| 17 | BEA105 | La Crosse, WI-MN |
| 18 | BEA106 | Rochester, MN-IA-WI |
| 19 | BEA108 | Wausau, WI |
| 20 | BEA111 | Minot, ND |
| 21 | BEA112 | Bismarck, ND-MT-SD |
| 22 | BEA117 | Sioux City, IA-NE-SD |
| 23 | BEA118 | Omaha, NE-IA-MO |
| 24 | BEA119 | Lincoln, NE |
| 25 | BEA133 | McAllen-Edinburg-Mission, TX |
| 26 | BEA135 | Odessa-Midland, TX |
| 27 | BEA149 | Twin Falls, ID |
| 28 | BEA150 | Boise City, ID-OR |